

1 ERNEST GALVAN – 196065  
KARA J. JANSSEN – 274762  
2 ADRIENNE SPIEGEL – 330482  
LUMA KHABBAZ – 351492  
3 ROSEN BIEN  
GALVAN & GRUNFELD LLP  
4 101 Mission Street, Sixth Floor  
San Francisco, California 94105-1738  
5 Telephone: (415) 433-6830  
Email: egalvan@rbgg.com  
6 kjanssen@rbgg.com  
aspiegel@rbgg.com  
7 lkhabbaz@rbgg.com

8 SUSAN M. BEATY – 324048  
CALIFORNIA COLLABORATIVE FOR  
9 IMMIGRANT JUSTICE  
1999 Harrison Street, Suite 1800  
10 Oakland, California 94612-4700  
Telephone: (510) 679-3674  
11 Email: susan@ccijustice.org

OREN NIMNI\*  
Mass. Bar No. 691821  
AMARIS MONTES\*  
Md. Bar No. 2112150205  
RIGHTS BEHIND BARS  
416 Florida Avenue N.W. #26152  
Washington, D.C. 20001-0506  
Telephone: (202) 455-4399  
Email: oren@rightsbehindbars.org  
amaris@rightsbehindbars.org

STEPHEN S. CHA-KIM\*  
N.Y. Bar No. 4979357  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, New York 10019-9710  
Telephone: (212) 836-8000  
Email: stephen.cha-kim@arnoldporter.com

CARSON D. ANDERSON – 317308  
ARNOLD & PORTER KAYE SCHOLER LLP  
3000 El Camino Real  
Five Palo Alto Square, Suite 500  
Palo Alto, California 94306-3807  
Telephone: (650) 319-4500  
Email: carson.anderson@arnoldporter.com

\* Admitted *pro hac vice*

15 Attorneys for Plaintiffs

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

19 CALIFORNIA COALITION FOR WOMEN  
PRISONERS et al.,

20 Plaintiffs,

21 v.

22 UNITED STATES OF AMERICA FEDERAL  
23 BUREAU OF PRISONS et al.,

24 Defendants.

Case No. 4:23-cv-04155-YGR

**DECLARATION OF OREN NIMNI IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIALS SHOULD BE  
SEALED REGARDING PORTIONS  
OF PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS**

25 Date: July 30, 2024

26 Time: 2:00 p.m.

Crtrm.: 1, 4th Floor

27 Judge: Hon. Yvonne Gonzalez Rogers

28 Trial Date: June 23, 2025

Case No. 4:23-cv-04155-YGR

1 I, Oren Nimni, hereby declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am Director of  
3 Litigation at Rights Behind Bars and counsel of record for the Plaintiffs and Proposed  
4 Class. I have personal knowledge of the facts set forth herein, and if called as a witness I  
5 could competently so testify. I make this declaration in support of Plaintiffs'  
6 Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

7 2. Attached as Exhibit A is a true and correct copy of the Special Master's  
8 Report.

9 3. Attached as Exhibit B is a true and correct copy of unredacted Plaintiffs'  
10 Opposition to United States' Notice of Motion to Dismiss, Stay Discovery, and Terminate  
11 Prospective Relief with the redacted excerpts referring to the Special Master's Report  
12 highlighted.

13 I declare under penalty of perjury under the laws of the State of California that the  
14 foregoing is true and correct, and that this declaration is executed at Washington, D.C. this  
15 2nd day of July, 2024.

16  
17 By: /s/ Oren Nimni  
18 Oren Nimni  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28